

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001

)
) No. 03 MDL 1570 (GBD/FM)
) ECF Case
)

This document relates to:

CONTINENTAL CASUALTY CO., *et al.* v. AL QAEDA ISLAMIC ARMY, *et al.*,
Case No. 04-CV-05970

**DEFENDANT AL HARAMAIN ISLAMIC FOUNDATION, INC. (USA)
ANSWER TO SECOND AMENDED COMPLAINT**

Defendant Al Haramain Islamic Foundation, Inc. (USA) (“AHIF-USA”), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits its Answer to Plaintiffs’ Second Amended Complaint (“Complaint”).

Background

1. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

Jurisdiction and Venue

2. AHIF-USA denies that this court has subject matter jurisdiction over AHIF-USA under 18 U.S.C. § 1961 (RICO), because this Court has dismissed all RICO claims against AHIF-USA. AHIF-USA denies that this court has subject matter jurisdiction over plaintiffs’ claims under 28 U.S.C. §§ 1330(a) and 1605, because those provisions apply solely to actions against foreign states.

3. AHIF-USA denies that venue is proper under 49 U.S.C. § 40101 or 28 U.S.C. § 1391(b)(2). AHIF-USA denies that venue is proper under 28 U.S.C. § 1391(f)(1), because those provisions apply solely to actions against foreign states.

4. AHIF-USA denies that venue is proper under 28 U.S.C. § 1605, because those provisions apply solely to actions against foreign states.

Parties

5. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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Summary of Allegations

27. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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260. AHIF-USA denies the allegations in paragraph 260 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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300. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

301. AHIF-USA denies the allegations in paragraph 301 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

302. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

303. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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317. AHIF-USA denies the allegations in paragraph 317 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

318. AHIF-USA denies the allegations in paragraph 318 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

319. AHIF-USA denies the allegations in paragraph 319 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

320. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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358. AHIF-USA denies the allegations in paragraph 358 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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475. AHIF-USA denies the allegations in paragraph 475 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

476. AHIF-USA denies the allegations in paragraph 476 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

477. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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488. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

489. AHIF-USA denies the allegations in paragraph 489 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

490. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

491. AHIF-USA denies the allegations in paragraph 491 insofar as they refer to AHIF-

USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

492. AHIF-USA denies the allegations in paragraph 492 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

493. AHIF-USA denies the allegations in paragraph 493 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

494. AHIF-USA denies that AHIF-USA is “controlled primarily from al-Haramain’s headquarters in Riyadh, Saudi Arabia,” or that it has “been exposed for providing direct and material support to al Qaeda.” AHIF-USA admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of AHIF-USA. AHIF-USA admits that the United States government has designated two groups in Bosnia and Somalia affiliated with al-Haramain (Saudi Arabia) as terrorist entities. AHIF-USA denies all other allegations in paragraph 494 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

495. AHIF-USA denies the allegations in paragraph 495 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

496. AHIF-USA admits that AHIF-USA is incorporated and registered to do business in Oregon. AHIF-USA denies the remaining allegations in paragraph 496 insofar as they refer to AHIF-USA, Soliman H.S. al-Buthe, or Perouz Seda Ghaty. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this

paragraph.

497. AHIF-USA denies the allegations in paragraph 497 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

498. AHIF-USA denies the allegations in paragraph 498 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

499. AHIF-USA denies the allegations in paragraph 499 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

500. AHIF-USA admits that the United States government has designated two groups in Bosnia and Somalia affiliated with al-Haramain (Saudi Arabia) as terrorist entities. AHIF-USA denies all other allegations in paragraph 500 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

501. AHIF-USA denies the allegations in paragraph 501 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

502. AHIF-USA denies the allegations in paragraph 502 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

503. AHIF-USA denies the allegations in paragraph 503 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all

other allegations contained in this paragraph.

504. AHIF-USA denies the allegations in paragraph 504 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

505. AHIF-USA denies the allegations in paragraph 505 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

506. AHIF-USA denies the allegations in paragraph 506 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

507. AHIF-USA denies the allegations in paragraph 507 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

508. AHIF-USA denies the allegations in paragraph 508 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

509. AHIF-USA denies the allegations in paragraph 509 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

510. AHIF-USA denies the allegations in paragraph 510 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

511. AHIF-USA denies the allegations in paragraph 511 insofar as they refer to AHIF-

USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

512. AHIF-USA denies that AHIF-USA is a business entity of al-Haramain (Saudi Arabia), and avers that “al-Haramain [sic] Foundation” and the “al-Haramain [sic] Islamic Foundation” are assumed business names of AHIF-USA under Oregon law, and denies that they are business entities of al-Haramain (Saudi Arabia). AHIF-USA denies that it, al-Haramain [sic] Foundation, or al-Haramain [sic] Islamic Foundation, are one and the same as al-Haramain’s office in Riyadh, Saudi Arabia. AHIF-USA admits that Aqeel al-Aqeel and Mansour al-Kadi were formerly officers of AHIF-USA. AHIF-USA denies the remaining allegations in paragraph 512, including that it is specifically linked to al Qaeda operations.

513. AHIF-USA denies that its Year 2000 Form 990 states that “it operates an Islamic center in Springfield, Missouri;” instead, its Year 2000 Form 990 states that “Prayer houses are located in Ashland, Ore. and Springfield, Mo.,” and the Springfield prayer house is operated by a separate group. AHIF-USA denies that the property in Springfield, Missouri is owned by al-Haramain (Saudi Arabia). AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in paragraph 513, to the extent an additional response is required.

514. AHIF-USA denies the allegations in paragraph 514 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

515. AHIF-USA denies the allegations in paragraph 515 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

516. AHIF-USA denies the allegations in paragraph 516 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

517. AHIF-USA denies the allegations in paragraph 517 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

518. AHIF-USA denies the allegations in paragraph 518 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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527. AHIF-USA denies the allegations in paragraph 527 insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

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569. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

570. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

571. AHIF-USA does not possess sufficient knowledge or information to admit or

deny the allegations contained in this paragraph.

572. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

573. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

574. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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593. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

594. AHIF-USA does not possess sufficient knowledge or information to admit or

deny the allegations contained in this paragraph.

595. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

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597. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

598. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

599. AHIF-USA does not possess sufficient knowledge or information to admit or deny the allegations contained in this paragraph.

CLAIMS

Count One — Property Damage (Trespass)

600. AHIF-USA hereby incorporates its responses to the previous allegations as if fully set forth herein.

601. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

602. No response is required to the allegations in this paragraph because the conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

603. No response is required to the allegations in this paragraph because the conspiracy cause of action was dismissed by the Memorandum Decision and Order of the Court dated

September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

604. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

605. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

606. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Count Two — RICO

607. AHIF-USA hereby incorporates its responses to the previous allegations as if fully set forth herein.

608. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

609. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

610. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

611. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

612. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

613. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Count Three — RICO

614. AHIF-USA hereby incorporates its responses to the previous allegations as if fully set forth herein.

615. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

616. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

617. No response is required to the allegations in this paragraph because the RICO cause of action was dismissed by the Memorandum Decision and Order of the Court dated September 13, 2010. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Prayer for Relief

(1) The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

(2) The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

(3) The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

(4) The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

Each and every allegation in plaintiffs' complaint that has not been specifically admitted is hereby denied.

(First) Addendum to Second Amended Complaint (page 175)

A. Al Rajhi Banking & Investment Corporation.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

(Second) Addendum to Second Amended Complaint (pages 176-221)

A. Al Rajhi Banking & Investment Corporation.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

B. Sulaiman Al Rajhi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

C. Saleh Al Rajhi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

D. Abdullah Al Rajhi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

E. Sheikh Abdul Aziz Al Ibrahim.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

F. World Assembly of Muslim Youth.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

G. The Abdul Aziz Al Ibrahim Foundation.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

H. Saleh Kamel (et al.).

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not

possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

(Third) Addendum to Second Amended Complaint (pages 222-269)

See Response to (Second) Addendum to Second Amended Complaint, *supra*.

(Fourth) Addendum to Second Amended Complaint (pages 270-424)

A. Al Rajhi Banking & Investment Corporation.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

B. Sulaiman Al Rajhi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

C. Saleh Al Rajhi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

D. Abdullah Al Rajhi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

E. Sheikh Abdul Aziz Al Ibrahim.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

F. World Assembly of Muslim Youth.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

G. The Abdul Aziz Al Ibrahim Foundation.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

H. Saleh Kamel (et al.).

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in

this paragraph.

I. Yeslam Bin Ladin.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

J. Al Barakaat (et al.).

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

K. Al Shamal Islamic Bank.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

L. Omar al-Bayoumi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

M. Mamoun Darkanzali.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA

denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

N. (no defendant listed herein)

O. Global Relief Foundation.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

P. Bank Al Taqwa (et al.)

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

Q. Islamic African Relief Agency.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

R. Benevolence International Foundation.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in

this paragraph.

S. Yassin Abdullah al-Qadi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

T. Wafa Humanitarian Organization.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

(no letter) Tadamon Islamic Bank.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

U. Al Haramain Islamic Foundation.

AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

V. SAAR Network Executives.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not

possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

W. Asat Trust.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

X. Dar Al Maal Al Islami Trust.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

Y. Saudi Bin Laden Group.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

Z. Bakr Bin Laden.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

AA. Abdullah & Omar Bin Laden.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

BB. Tarek Bin Laden.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

CC. Mohammed Bin Laden Organization.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

DD. Prince Naif.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

EE. Rabita Trust.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in

this paragraph.

FF. Prince Abdullah (et al.).

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

GG. Abdulrahman Alamoudi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

HH. Prince Mohamed.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

II. African Muslim Agency (et al.).

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

JJ. Mar-Jac Poultry, Inc.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA

denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

KK. Saudi Red Crescent Society and Dr. Abdul Rahman Al Swailem.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

LL. Adnan Basha.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

MM. Shahir A. Batterjee.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

NN. Dr. Abdullah bin Mohsen Al Turki.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

OO. International Islamic Relief Organization.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

PP. Saudi Joint Relief Committee for Kosovo and Chechnya.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

QQ. Wael Julaidain.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

RR. Tarik Hamdi.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

SS. Saudi High Commission for Relief to Bosnia and Herzegovina.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not

possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

TT. Prince Salman.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

UU. National Commercial Bank.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

VV. Prince Sultan.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

WW. (no defendant listed)

XX. Soliman Al-Buthe.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

YY. Faisal Islamic Bank – Sudan.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

(YY) Khalid Bin Mahfouz.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

ZZ. Dubai Islamic Bank.

These allegations appear to relate to defendants other than AHIF-USA. AHIF-USA denies the allegations in this paragraph insofar as they refer to AHIF-USA. AHIF-USA does not possess sufficient knowledge or information to admit or deny all other allegations contained in this paragraph.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against AHIF-USA for which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

(Causation)

There is no causal connection between any of AHIF-USA's activities and plaintiffs'

injuries.

THIRD AFFIRMATIVE DEFENSE

(Causation)

No act or omission of any agent, servant, or employee of AHIF-USA proximately caused any harm or damage to plaintiffs.

FOURTH AFFIRMATIVE DEFENSE

(Causation)

AHIF-USA's activities were not the proximate cause of any harm or damage to plaintiffs.

FIFTH AFFIRMATIVE DEFENSE

(Scienter)

Plaintiffs fail to adequately allege scienter on AHIF-USA's part.

SIXTH AFFIRMATIVE DEFENSE

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

SEVENTH AFFIRMATIVE DEFENSE

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against AHIF-USA.

EIGHTH AFFIRMATIVE DEFENSE

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against AHIF-USA.

NINTH AFFIRMATIVE DEFENSE

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against AHIF-USA.

TENTH AFFIRMATIVE DEFENSE

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against AHIF-USA.

ELEVENTH AFFIRMATIVE DEFENSE

(Statute of Limitations)

Plaintiffs' claims against AHIF-USA are barred, in whole or in part, by the applicable statute of limitation(s).

TWELFTH AFFIRMATIVE DEFENSE

(Punitive Damages)

Plaintiffs' claims for punitive damages against AHIF-USA are barred because AHIF-USA's activities, as alleged by plaintiffs, were not committed with intent, malice, willful and

outrageous conduct aggravated by evil motive, or reckless indifference, and none of AHIF-USA's activities in any way were intended to, or did harm, the plaintiffs in this action.

THIRTEENTH AFFIRMATIVE DEFENSE

(Joint or Several Liability)

Defendant is not liable for plaintiffs' damages based on the doctrines of several liability and/or combined or comparative fault, under N.Y. C.P.L.R. § 1601 *et seq.*

FOURTEENTH AFFIRMATIVE DEFENSE

(No Double Recovery)

Plaintiffs have waived their claims based on the doctrine disallowing double recovery and/or the doctrine of election of remedies.

FIFTEENTH AFFIRMATIVE DEFENSE

(Collateral Source)

Plaintiffs have waived their claims based on the collateral source doctrine.

SIXTEENTH AFFIRMATIVE DEFENSE

(Subrogation)

Plaintiffs have waived their claims based on the doctrine of subrogation and/or the doctrine of equitable subrogation.

SEVENTEENTH AFFIRMATIVE DEFENSE

In response to plaintiffs' claims, AHIF-USA intends to invoke any other defenses, including affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the Southern District of New York, to assert such defenses.

AHIF-USA requests that the Plaintiffs' First Amended Complaint be dismissed with prejudice as to AHIF-USA, and that the Court award attorney's fees and costs to AHIF-USA in defending against a case with no factual or legal basis against AHIF-USA, and award any other relief that the Court deems just under the circumstances.

Respectfully submitted,

/S/ Lynne Bernabei

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Alan R. Kabat D.C. Bar No. 464258
Bernabei & Wachtel, PLLC
1775 T Street, N.W.
Washington, D.C. 20009
(202) 745-1942

Attorneys for Defendant
Al Haramain Islamic Foundation, Inc.

Dated: October 15, 2010

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2010, I caused the foregoing to be served electronically on counsel of record by the Court's Electronic Case Filing (ECF) System, pursuant to ¶ 9(a) of Case Management Order No. 2 (June 16, 2004).

/s/ Alan R. Kabat

Alan R. Kabat